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April 7, 2023

VIA ECF

The Honorable John G. Koeltl
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *Amplify Car Wash Advisors LLC v. Car Wash Advisory LLC*, No. 1:22-cv-05612

Dear Judge Koeltl:

We represent Plaintiff, Amplify Car Wash Advisors, LLC, and file this joint letter motion on behalf of all parties under Rules 1E and 1F of Your Honor's Individual Rules of Practice in Civil Cases to request an extension of discovery-related deadlines set forth in the Case Management Plan and Scheduling Order entered on November 22, 2022 (Dkt. 44). Plaintiff has obtained consent from Defendants in this request to extend the discovery deadlines by 60 days.

Section 13 of the Case Management Plan allows for modification of the case management plan and scheduling order by the Court for good cause shown. The Parties have been actively engaged in written discovery. As this Court is aware, Plaintiff filed a Letter Motion for a Local Rule 37.2 Conference, which this Court granted on March 22, 2023. Dkt. 47. This Court set a status conference for May 18, 2023, which on belief is the date the Court will hold the Rule 37.2 Conference. The close of fact discovery is on May 23, 2023, only five days after the Rule 37.2 Conference. Plaintiff's concern is that the issues surrounding the discovery disputes will not be resolved before the close of fact discovery. In addition, information from the discovery sought is necessary to conduct a meaningful deposition of the Defendants and to adequately prepare any needed expert reports.

The Parties have both agreed to a 60 day extension, and therefore respectfully request that this Court extend discovery in this case, so that fact discovery closes on July 22, 2023, with the below deadlines reflecting the extended fact discovery deadline of July 22, 2023:

- a. Discovery requests shall be served 60 days prior to fact discovery close.
- b. Depositions shall be completed by close of fact discovery.
- c. Expert disclosures shall be served within 45 days of the close of fact discovery.
- d. Expert rebuttals shall be served within 30 days of expert disclosures.
- e. Expert depositions shall be completed within 14 days of expert rebuttals.



Best Regards,

A handwritten signature in black ink, appearing to read 'Sofia J. Quezada', is written in a cursive style.

Sofia J. Quezada
4857-8739-8492, v. 1